

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE,  
AT KNOXVILLE**

LARRY MARKOWSKI	)	
and VALERIE MARKOWSKI,	)	
	)	
Plaintiffs	)	CIVIL ACTION
	)	
vs.	)	NO. _____
	)	
ALLSTATE PROPERTY and CASUALTY	)	JURY DEMAND
COMPANY,	)	
	)	
Defendant	)	

**NOTICE OF REMOVAL**

Comes now the defendant, Allstate Property and Casualty Company, and petitions this Court for removal of an action heretofore filed in the Circuit Court for Monroe County, Tennessee, and for grounds would show the Court as follows:

I.

The above named plaintiffs have filed a Complaint and Summons in the Circuit Court for Monroe County, Tennessee, under Civil Action No. V07073H said action being filed on the 6th day of March, 2007, and a copy of said complaint being received by defendant Allstate Property and Casualty Company on March 19, 2007.

II.

The above lawsuit is a breach of contract action wherein the plaintiffs seeks recovery from the defendant of the proceeds of an insurance policy allegedly insuring a house and contents at 121 Hardin Cemetery Road, Vonore, Tennessee, which were allegedly destroyed by a fire on or about March 19, 2006. The complaint seeks breach of contract damages in the amount of \$230,000.00 plus other damages. A copy of the Complaint is attached hereto as Exhibit "A".

III.

This Notice of Removal is filed within the statutory period required by 28 USC §1446. There is a complete diversity between the plaintiffs and defendant and the amount in controversy exceeds the sum of Seventy Five Thousand (\$75,000.00) Dollars, exclusive of interest and cost.

IV.

The plaintiffs are citizens and residents of Monroe County, Tennessee and are domiciled in Monroe County, Tennessee. Defendant, Allstate Property and Casualty Company, is a corporation organized and existing under the laws of the State of Illinois with its principal place of business in Northbrook, Illinois. It is not incorporated in Tennessee and does not have its principal place of business in Tennessee. There is complete diversity of citizenship between the parties as required by 28 USC §1332. The amount in controversy exceeds Seventy Five Thousand (\$75,000.00) Dollars exclusive of interest and costs and is, therefore, within the statutory jurisdiction set forth at 28 USC §1332.

V.

WHEREFORE, the defendant, Allstate Property and Casualty Company, respectfully requests the Court to accept removal of this cause from the Circuit Court for Monroe County, Tennessee, and to proceed with this action in accordance with the law.

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